

March 13, 2024

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: UM 2238(2)—PacifiCorp’s Application for Approval of Deferred Accounting for Administrative Costs Associated with House Bill 2475 Energy Affordability Act

PacifiCorp d/b/a Pacific Power submits for filing its Application for Reauthorization of Deferred Accounting for Administrative Costs Associated with House Bill 2475 Energy Affordability Act.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
oregondockets@pacificorp.com

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
carla.scarsella@pacificorp.com

Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2238(2)

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred
Accounting for Administrative Costs
Associated with House Bill 2475 Energy
Affordability Act

**APPLICATION FOR DEFERRED
ACCOUNTING**

I. INTRODUCTION

In accordance with Oregon Revised Statutes (ORS) 757.259(2)(e) and Oregon Administrative Rule (OAR) 860-027-0300, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits this application to the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferred accounting to track the incremental administrative costs associated with House Bill (HB) 2475 Energy Affordability Act for the 12 months beginning March 29, 2024. PacifiCorp will seek amortization for recovery of the deferred costs in a future Commission proceeding.

II. CONTACT INFORMATION

Communications regarding this application should be addressed to:

Oregon Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: oregondockets@pacificorp.com

Carla Scarsella
Deputy General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: carla.scarsella@pacificorp.com

In addition, the Company requests that all data requests regarding this application be sent to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Informal questions may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

III. BACKGROUND

In May 2021, the Governor of Oregon signed into law HB 2475, the Energy Affordability Act. This bill amends ORS 757.230 (1) to provide that utilities may take into account the “differential energy burdens on low-income customers and other economic, social equity or environmental justice factors that affect affordability for certain classes of utility customers” when designing rates and provides utilities with the opportunity to offer a bill discount to income-qualified eligible residential customers.

In docket UM 2223, PacifiCorp filed for authorization to defer the incremental costs and revenues associated with implementation and administration of HB 2475. On March 22, 2022, in Order No. 22-094, the Commission adopted Staff’s proposal to approve the Company’s deferral application for the costs and revenues associated with the low-income bill discount program but required the Company to file a new deferral application, in a separate docket, to establish a separate account to track and defer incremental administrative costs associated with the implementation of HB 2475 mitigation measures.

On March 29, 2022, PacifiCorp filed an application to defer the incremental administrative costs associated with HB 2475. The Commission approved the deferral application on June 2, 2022, in Order No. 22-198, for the 12 months beginning on

March 29, 2022. Thus, incremental administrative costs incurred prior to March 29, 2022, will be included with the costs deferred in UM 2223.¹

On March 23, 2023, PacifiCorp filed an application to continue to defer the incremental administrative costs associated with HB 2475 for the 12 months beginning on March 29, 2023. The Commission approved the deferral application on September 11, 2023, in Order No. 23-329.

IV. DEFERRAL OF COSTS

PacifiCorp respectfully requests reauthorization under ORS 757.259(2)(e) to continue to track and defer the incremental administrative costs associated with the implementation of HB 2475 mitigation measures for the 12-month period beginning March 29, 2024. As required by OAR 860-027-0300(3) and (4), PacifiCorp provides the following:

A. Description of Utility Expense

This deferral application requests reauthorization to track the incremental administrative costs, including marketing costs, associated with PacifiCorp's low-income bill discount program.

B. Reasons for Deferral

As discussed above, PacifiCorp requests reauthorization to defer the incremental administrative costs to implement and administer the low-income bill discount program. ORS 757.259(2)(e) allows the deferral of identifiable utility expenses in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne and benefits received by customers. Commission approval of PacifiCorp's application

¹ On June 16, 2022, PacifiCorp filed Advice No. 22-008/docket UE 409 to implement Schedule 7, Low-Income Discount, its interim low-income bill discount for residential customers. The filing also included implementation of Schedule 92, Low-Income Discount Cost Recovery Adjustment. The Commission approved the Company's filing on September 1, 2022, in Order No. 22-317.

will allow the Company to track the incremental administrative costs for the program separate from PacifiCorp's other costs and revenues. Granting this Application will minimize the frequency of rate changes and match appropriately the costs borne by, and benefits received by customers.

PacifiCorp's application is consistent with the Commission's previous approval of deferred accounting applications.

C. Proposed Accounting

If this application is approved, PacifiCorp proposes to record deferred amounts to Federal Energy Regulatory Commission account 182.3, Other Regulatory Assets. This account will accrue interest at the Modified Blended Treasury Rate, consistent with the program costs and revenues deferred in UM 2223.

D. Estimate of Amounts

PacifiCorp has estimated an annual budget of \$250,000 for administrative costs.

E. Notice

A copy of the Notice of Application and a list of persons served with the notice are attached as Exhibit A to this application.

F. Entries in the Deferred Account to Date

Exhibit B of the Application provides the entries in the deferred account to date.

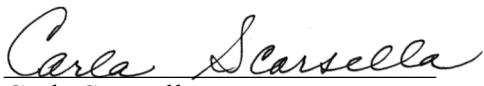
G. Reason for Continuation of Deferred Accounting

As discussed in this application, continuation of this deferral is necessary to track incremental administrative costs to implement and administer the rate mitigation measures authorized under HB 2475(7).

V. CONCLUSION

For the reasons set forth above, in accordance with ORS 757.259(2)(e), PacifiCorp respectfully requests reauthorization for a deferred account beginning on March 29, 2024, to track the incremental administrative costs associated with HB 2475.

Respectfully submitted this 13th day of March, 2024.

By: 
Carla Scarsella
Deputy General Counsel

Attorney for PacifiCorp d/b/a Pacific Power

Exhibit A

Notice of Application

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2238(2)**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

Application for Approval of Deferred
Accounting for Administrative Costs
Associated with House Bill 2475 Energy
Affordability Act


**NOTICE OF
APPLICATION FOR DEFERRED
ACCOUNTING**

On March 13, 2024, PacifiCorp d/b/a Pacific Power filed an application with the Public Utility Commission of Oregon (Commission) for an order reauthorizing deferred accounting to track the incremental administrative costs associated with House Bill 2475 Energy Affordability Act. The reauthorization will not authorize a change in rates but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding. To obtain a copy of the application, contact the following:

Oregon Dockets
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Email: oregondockets@pacificorp.com

Any person may submit written comments to the Commission regarding the application within 25 days of the date of this filing.

Respectfully submitted on March 13, 2024.

By: 
Carla Scarsella
Deputy General Counsel

CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Notice of Application for Deferred Accounting** was served on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List UE 399

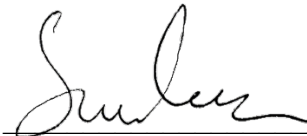
| PACIFICORP | |
|---|---|
| PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com | KATHERINE A MCDOWELL (C) MCDOWELL RACKNER & GIBSON PC 419 SW 11TH AVE., SUITE 400 PORTLAND, OR 97205 katherine@mrg-law.com |
| CARLA SCARSELLA (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 carla.scarsella@pacificorp.com | |
| STAFF | |
| JOHANNA RIEMENSCHNEIDER (C) PUC STAFF - DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 johanna.riemenschneider@doj.state.or.us | MATTHEW MULDOON (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 matt.muldoon@state.or.us |
| AWEC | |
| BRENT COLEMAN (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY, SUITE 450 PORTLAND, OR 97201 blc@dvclaw.com | JESSE O GORSUCH (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 jog@dvclaw.com |
| TYLER C PEPPLER (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 tcp@dvclaw.com | |

| | |
|--|---|
| CALPINE SOLUTIONS | |
| GREGORY M. ADAMS (C) RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com | GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO, CA 92101 greg.bass@calpinesolutions.com |
| KEVIN HIGGINS (C) ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com | |
| CUB | |
| MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 mike@oregoncub.org | OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org |
| FRED MEYER | |
| JUSTIN BIEBER (C) FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY, UT 84111 jbieber@energystrat.com | KURT J BOEHM (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com |
| JODY KYLER COHN (C) BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 jkylerecohn@bkllawfirm.com | |

| | |
|--|--|
| KWUA | |
| LLOYD REED (C) REED CONSULTING 10025 HEATHERWOOD LANE HIGHLANDS RANCH, CO 80126 lloyd.reed@lloydreedconsulting.com | CRYSTAL RIVERA (C) SOMACH SIMMONS & DUNN 500 CAPITOL MALL STE 1000 SACRAMENTO, CA 95814 crivera@somachlaw.com |
| CORENE RODDER SOMACH SIMMONS & DUNN crodder@somachlaw.com | |
| NEWSUN ENERGY | |
| JACOB (JAKE) STEPHENS NEWSUN ENERGY 3500 S DUPONT HWY DOVER, DE 19901 jstephens@newsunenergy.net | MAX YOKLIC NEW SUN ENERGY LLC 2033 E. SPEEDWAY BLVD, SUITE 200 TUCSON, AZ 85719 myoklic@newsunenergy.net |
| MARIE P BARLOW NEWSUN ENERGY LLC 390 SW COLUMBIA ST STE 120 BEND OR 97702 mbarlow@newsunenergy.net | |
| NIPPC | |
| CARL FINK BLUE PLANET ENERGY LAW LLC 628 SW CHESTNUT ST, STE 200 PORTLAND, OR 97219 cmfink@blueplanetlaw.com | SPENCER GRAY NIPPC sgray@nippc.org |
| OREGON FARM BUREAU | |
| PAUL S SIMMONS (C) OREGON FARM BUREAU FEDERATION 550 CAPITOL MALL STE 1000 SACREAMENTO, CA 95814 psimmons@somachlaw.com | |
| SBUA | |
| GUILLERMO CASTILLO SMALL BUSINESS UTILITY ADVOCATES 18guillermo.castillo@gmail.com | MARY ANNE COOPER (C) OREGON FARM BUREAU FEDERATION 1320 CAPITOL ST NE STE 200 SALEM, OR 97301 maryanne@oregonfb.org |
| DIANE HENKELS (C) SMALL BUSINESS UTILITY ADVOCATES 621 SW MORRISON ST. STE 1025 PORTLAND, OR 97205 diane@henkelslaw.com | |

| | |
|--|--|
| VITESSE | |
| DENNIS BARTLETT (C) META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 dbart@meta.com | |
| IRION A SANGER (C) SANGER LAW PC 4031 SE HAWTHORNE BLVD PORTLAND, OR 97214 irion@sanger-law.com | LIZ FERRELL (C) META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 eferrell@meta.com |
| WALMART | |
| VICKI M BALDWIN (C) PARSONS BEHLE & LATIMER 201 S MAIN ST STE 1800 SALT LAKE CITY, UT 84111 vbaldwin@parsonsbehle.com | |
| ALEX KRONAUER (C) WALMART alex.kronauer@walmart.com | STEVE W CHRISS (C) WAL-MART STORES, INC. 2001 SE 10TH ST BENTONVILLE, AR 72716-0550 stephen.chriss@wal-mart.com |

Dated this 13th day of March, 2024.



Santiago Gutierrez
Coordinator, Regulatory Operations

CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's Notice of Application for Deferred Accounting** was served on the parties listed below via electronic delivery in compliance with OAR 860-001-0180.

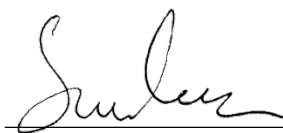
Service List UE 433

| PACIFICORP | |
|---|--|
| PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com | CARLA SCARSELLA (C) PACIFICORP 825 NE MULTNOMAH ST STE 2000 PORTLAND, OR 97232 carla.scarsella@pacificorp.com |
| STAFF | |
| JOHANNA RIEMENSCHNEIDER (C) PUC STAFF - DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 johanna.riemenschneider@doj.state.or.us | BETSY BRIDGE (C) OREGON DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM, OR 97301-4796 betsy.bridge@doj.state.or.us |
| MATTHEW MULDOON (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 matt.muldoon@state.or.us | |
| CUB | |
| JENNIFER HILL-HART (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 jennifer@oregoncub.org | BOB JENKS (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND, OR 97205 bob@oregoncub.org |
| OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org | |
| AWEC | |
| BRENT COLEMAN (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY, SUITE 450 PORTLAND, OR 97201 blc@dvclaw.com | JESSE O GORSUCH (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 jog@dvclaw.com |

| | |
|---|--|
| <p>TYLER C PEPPE (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND, OR 97201 tcp@dvclaw.com</p> | |
| <p>CALPINE SOLUTIONS</p> | |
| <p>GREGORY M. ADAMS RICHARDSON ADAMS, PLLC PO BOX 7218 BOISE, ID 83702 greg@richardsonadams.com</p> | <p>GREG BASS CALPINE ENERGY SOLUTIONS, LLC 401 WEST A ST, STE 500 SAN DIEGO, CA 92101 greg.bass@calpinesolutions.com</p> |
| <p>KEVIN HIGGINS ENERGY STRATEGIES LLC 215 STATE ST - STE 200 SALT LAKE CITY, UT 84111-2322 khiggins@energystrat.com</p> | |
| <p>KWUA</p> | |
| <p>KWUA KLAMATH WATER USER ASSOCIATION KLAMATH BASIN WATER USER PROTECTIVE ASSOCIATION 2312 SOUTH SIXTH STREET, STE A KLAMATH FALLS OR 97601 assist@kwua.org</p> | <p>PAUL S. SIMMONS (C) SOMACH SIMMONS & DUNN 500 CAPITOL MALL, STE 1000 SACRAMENTO, CA 95814 psimmons@somachlaw.com</p> |
| <p>VITESSE LLC</p> | |
| <p>KYLE MOORE META PLATFORMS, INC. 1 HACKER WAY MENLO PARK, CA 94025 kyletmoore@meta.com</p> | <p>IRION A SANGER SANGER LAW PC 4031 SE HAWTHORNE BLVD PORTLAND, OR 97214 irion@sanger-law.com</p> |
| <p>JONI L SLIGER SANGER LAW PC 4031 SE HAWTHORNE BLVD PORTLAND, OR 97214 joni@sanger-law.com</p> | |
| <p>FRED MEYER</p> | |
| <p>JUSTIN BIEBER FRED MEYER/ENERGY STRATEGIES LLC 215 SOUTH STATE STREET, STE 200 SALT LAKE CITY, UT 84111 jbieber@energystrat.com</p> | <p>KURT J BOEHM BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 kboehm@bkllawfirm.com</p> |

| | |
|---|---|
| <p>JODY KYLER COHN BOEHM KURTZ & LOWRY 36 E SEVENTH ST - STE 1510 CINCINNATI, OH 45202 jkylercohn@bklawfirm.com</p> | |
| AMAZON DATA SERVICES | |
| <p>DEREK D. GREEN DAVIS WRIGHT TREMAINE LLP 1300 SW FIFTH AVE STE 2400 PORTLAND, OR 97201 derekgreen@dwt.com</p> | <p>OLIVIER JAMIN DAVIS WRIGHT TREMAINE LLP 1300 SW FIFTH AVE STE 2400 PORTLAND, OR 97201 olivierjamin@dwt.com</p> |

Dated this 13th day of March, 2024.



Santiago Gutierrez
Coordinator, Regulatory Operations

Exhibit B

OR Low Income Bill Discount Admin Costs

| | | |
|-----------------|-------------|---------------|
| Interest | Rate | Period |
| | 5.13% | 2023 MBT |
| | 5.40% | 2024 MBT |

| Period | Beginning Balance | Deferral | | | Interest | Ending Balance | |
|----------------------|-------------------|------------------------|------------------------|------------------------|---------------------|--------------------|----------------------|
| | | Internal ORD 349030 | External ORD 349031 | Outreach ORD 349032 | | | Survey ORD 350779 |
| Jan-23 | 7,820.86 | 534.00 | 334.75 | 19.20 | 35.33 | 8,744.14 | |
| Feb-23 | 8,744.14 | 546.00 | 515.52 | 1,125.00 | 42.05 | 10,972.71 | |
| Mar-23 | 10,972.71 | 1,001.00 | 254.41 | | 49.59 | 12,277.71 | |
| Apr-23 | 12,277.71 | 2,093.00 | 388.31 | 1,076.24 | 60.09 | 15,895.36 | |
| May-23 | 15,895.36 | 1,704.02 | 60.26 | 128.20 | 18,050.00 | 110.58 | 35,948.42 |
| Jun-23 | 35,948.42 | 728.00 | 160.68 | 25.50 | 18,050.00 | 194.22 | 55,106.81 |
| Jul-23 | 55,106.81 | 928.81 | 120.51 | 534.20 | | 238.97 | 56,929.30 |
| Aug-23 | 56,929.30 | 910.00 | 107.12 | | | 245.55 | 58,191.96 |
| Sep-23 | 58,191.96 | 637.00 | | 20.82 | | 250.18 | 59,099.96 |
| Oct-23 | 59,099.96 | 819.00 | | 514.09 | 16,550.00 | 290.88 | 77,273.93 |
| Nov-23 | 77,273.93 | 182.00 | 40.17 | 21,621.28 | | 377.04 | 99,494.41 |
| Dec-23 | 99,494.41 | 1,729.00 | 40.17 | 3,853.86 | | 437.36 | 105,554.80 |
| FY 2023 TOTAL | | \$ 11,811.83 | \$ 2,021.90 | \$ 28,918.39 | \$ 52,650.00 | \$ 2,144.76 | |
| Jan-24 | 105,554.80 | 1,392.00 | 388.31 | 16,550.00 | | 516.24 | 124,401.35 |
| Feb-24 | 124,401.35 | 3,480.00 | 40.17 | | | 567.73 | 128,489.25 |
| FY 2024 TOTAL | | \$ 4,872.00 | \$ 428.48 | \$ 16,550.00 | \$ - | \$ 1,083.97 | |